

LAW OFFICES OF SUSAN G. KELLMAN
25 EIGHTH AVENUE • BROOKLYN, NEW YORK 11217
(718) 783-8200 • FAX (718) 783-8226 • SGK@KELLMANESQ.COM
FELLOW, AMERICAN COLLEGE OF TRIAL LAWYERS

February 23, 2022

The Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: U.S. v. Jie Lin 21 Cr. 343 (SHS)

Dear Judge Stein:

I was appointed as CJA counsel in the above-referenced matter.

I write, respectfully, to request that your Honor appoint Ms. Siminya Massias, to serve as a paralegal, to assist counsel in connection with the above-captioned matter.

Ms. Massias holds a law degree from the BPP Law School in London, England and is a licensed solicitor. While she is not yet licensed to practice law in the United States, she is extremely bright and can be a tremendous asset in this case, where the discovery is massive. I have discussed her appointment with Alan Nelson, the Case Budgeting Attorney at the Second Circuit, and he explained that in situations like this the Circuit would authorize reimbursement at the rate of \$85/hour, subject, of course, to your Honor's approval of her appointment. A copy of Ms. Massias' CV is attached for your Honor's review.

Accordingly, I respectfully request that your Honor appoint Ms. Massias to act as a paralegal in connection with this matter.

The Court's attention to this matter is appreciated.

Respectfully submitted,

Susan G. Kellman

cc: Simi Massias

2/23/2022
So ordered
Sidney H. Stein
CRS05